

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

330574,50001.1

4. While Debtors' Amended Chapter 13 Plan lists the claim amount as set forth in Movant's claim, the repayment terms are indefinite, providing for monthly payments "when funds avail[able]."

5. Moreover, Movant's claim is not secured by a purchase money security interest. Rather, trash collection services are lienable and fall within the ambit of the Municipal Claims and Tax Liens Law of 1923, Act of May 16, 1923, P.L. 207, as amended, 53 P.S. §7101, *et seq.*

6. Debtors' Amended Chapter 13 Plan fails to appropriately provide for the Movant's claim.

WHEREFORE, Movant, Wilkesburg Borough respectfully requests that this Honorable Court deny confirmation of the Debtors' Chapter 13 Plan dated August 14, 2021.

Dated: September 1, 2021

Respectfully submitted:

MAIELLO, BRUNGO & MAIELLO, LLP

/s/ Jennifer L. Cerce

Jennifer L. Cerce, Esquire

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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a true and correct copy of the foregoing OBJECTION OF WILKINSBURG BOROUGH TO CONFIRMATION OF DEBTORS' AMENDED CHAPTER 13 PLAN DATED AUGUST 14, 2021 been served this 1st day of September, 2021 by first-class United States mail, postage prepaid, upon:

Gary William Short, Esquire  
212 Windgap Road  
Pittsburgh, PA 15235

Brian L. Mohring  
Rayna L. Mohring  
5 Scenery Road  
Pittsburgh, PA 15221

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